Appendix C to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Re- lief is Not Granted	Why a Less Restrictive Alternative to the Re- lief Sought is Not Avail- able	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated May 3, 2024 [ECF No. 275]	Letter motion refers to (1) Save On SP, LLC's ("SaveOn") strategy for communicating with providers and patients, (2) internal emails between SaveOn employees discussing its communications with providers and patients, (3) the contents of internal drafts of communications to providers and patients, (4) communications between SaveOn and providers, and (5) communications between SaveOn and its clients, comprising proprietary business information. See ECF No. 275.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

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Exhibit 1	Exhibit 1 is a letter from	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	counsel for Johnson &	SaveOn would be at a	sion of the Letter is be-		
dated May	Johnson Health Services,	competitive disadvantage	ing filed. It is believed		
3, 2024	Inc. (with its affiliates,	should its proprietary	that no less restrictive al-		
[ECF No.	"J&J") to counsel for	non-public business in-	ternative is available to		
275]	SaveOn. Exhibit 1	formation and strategy	prevent the disclosure of		
	contains references to (1)	be disclosed to competi-	SaveOn's proprietary		
	SaveOn's strategy for	tors and other market	business information.		
	communicating with	participants.			
	providers and (2)				
	SaveOn's internal				
	communications about				
	the geographical scope				
	of its business,				
	comprising proprietary				
	business information.				
	See ECF No. 275 at Ex.				
	1.				
Exhibit 2	Exhibit 2 is a letter from	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	counsel for SaveOn to	SaveOn would be at a	sion of the Letter is be-	110	1 to objection
dated May	counsel for J&J. Exhibit	competitive disadvantage	ing filed. It is believed		
3, 2024	2 contains references to	should its proprietary	that no less restrictive al-		
5, 2024 [ECF No.	(1) SaveOn's strategy for	non-public business in-	ternative is available to		
275]	communicating with	formation and strategy	prevent the disclosure of		
213]	providers, (2) SaveOn's	be disclosed to competi-	*		
	internal communications	tors and other market	SaveOn's proprietary business information.		
			business information.		
	about its strategy for	participants.			
	responding to drug				
	manufacturers, and (3)				
	SaveOn's internal				
	communications about				
	the geographical scope				
	of its business,				

Exhibit 4	comprising proprietary business information. See ECF No. 275 at Ex. 2. Exhibit 4 is a document	If relief is not granted,	It is believed that no less	No	No objection
to Letter dated May 3, 2024 [ECF No. 275]	reflecting SaveOn's CEO's draft ideas for an article, comprising proprietary business information about SaveOn's business practices and marketing strategy. <i>See</i> ECF No. 275 at Ex. 4.	SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 5 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 5 is an internal draft of a patient communication that was never sent, comprising proprietary information about SaveOn's marketing strategy. <i>See</i> ECF No. 275 at Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 6 is an internal draft of a patient communication that was never sent, comprising proprietary information about SaveOn's marketing strategy. <i>See</i> ECF No. 275 at Ex. 6.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 7 to Letter dated May	Exhibit 7 is an email exchange between SaveOn employees and	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the	No	No objection

3, 2024 [ECF No. 275]	employees from Express Scripts, Inc. discussing SaveOn's marketing strategy in communicating with health plan clients, comprising proprietary business information. <i>See</i> ECF No. 275 at Ex. 7.	should its proprietary non-public business information be disclosed to competitors and other market participants.	disclosure of SaveOn's proprietary business information.		
Exhibit 8 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 8 is an email from SaveOn's CEO to an employee at Accredo discussing SaveOn's marketing strategy in communicating with health plan clients, comprising proprietary business information. See ECF No. 275 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 9 is a text exchange between SaveOn's CEO and an Accredo employee. The exchange discusses SaveOn's marketing strategy in communicating with health plan clients, comprising proprietary business information.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	See ECF No. 275 at Ex. 9.				
Exhibit 11 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 11 is an email exchange between SaveOn employees, Express Scripts, Inc. employees, and a health plan. The emails discuss SaveOn's marketing strategy for communicating with providers and health plans, comprising proprietary business information. See ECF No. 275 at Ex. 11.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 12 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 12 is an email exchange between SaveOn employees, Express Scripts, Inc. employees, and a health plan. The emails discuss SaveOn's marketing strategy for communicating with providers and health plans, comprising proprietary business information. See ECF No. 275 at Ex. 12.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 13 to Letter dated May	Exhibit 13 is an email exchange between SaveOn employees and a	If relief is not granted, SaveOn would be at a competitive disadvantage	A redacted, public version of the email exchange is being filed. It	No	No objection

3, 2024 [ECF No. 275]	health plan. The emails discuss SaveOn's strategy for communicating with providers and health plans, comprising proprietary business information. See ECF No. 275 at Ex. 13.	should its proprietary non-public business information be disclosed to competitors and other market participants.	is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 14 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 14 is an email exchange between SaveOn employees and Express Scripts, Inc. employees discussing SaveOn's marketing strategy for communicating with providers and health plans, comprising proprietary business information. See ECF No. 275 at Ex. 14.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 16 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 16 is a letter from counsel for SaveOn to counsel for J&J. The letter references SaveOn's marketing strategy for communicating with providers and health plans, comprising proprietary business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	information. <i>See</i> ECF No. 275 at Ex. 16.				
Exhibit 20 to Letter dated May 3, 2024 [ECF No. 275]	Exhibit 20 is a letter from counsel for SaveOn to counsel for J&J. Exhibit 20 contains references to (1) SaveOn's strategy for communicating with providers and (2) SaveOn's internal communications about the geographical scope of its business, comprising proprietary business information. See ECF No. 275 at Ex. 20.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Letter dated May 14, 2024 [ECF No. 328]	Letter motion contains direct reference to internal SaveOn documents discussing SaveOn's plan for communicating with providers, patients, and health plans, comprising proprietary business information. See ECF No. 328.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to Letter dated May 14, 2024	Exhibit 1 is a letter from counsel for SaveOn to counsel for J&J. Exhibit 1 contains references to	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	A redacted, public version of the Letter is being filed. It is believed	No	No objection

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[ECF No.	SaveOn's strategy for	non-public business in-	that no less restrictive al-		
328]	communicating with	formation and strategy	ternative is available to		
	health plans, comprising	be disclosed to competi-	prevent the disclosure of		
	proprietary business	tors and other market	SaveOn's proprietary		
	information. See ECF	participants.	business information.		
	No. 328 at Ex. 1.				
Exhibit 2	Exhibit 2 is SaveOn's	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	R&Os to J&J's 11th Set	SaveOn would be at a	sion of the R&Os is be-		
dated May	of RFPs. Exhibit 2	competitive disadvantage	ing filed. It is believed		
14, 2024	contains references to (1)	should its proprietary	that no less restrictive al-		
[ECF No.	SaveOn's relationship	non-public business in-	ternative is available to		
328]	with health plans and	formation and strategy	prevent the disclosure of		
	Express Scripts, Inc., (2)	be disclosed to competi-	SaveOn's proprietary		
	SaveOn's strategy for	tors and other market	business information.		
	communicating with	participants.			
	providers and (3)	The state of the s			
	SaveOn's internal				
	communications about				
	the geographical scope				
	of its business,				
	comprising proprietary				
	business information.				
	See ECF No. 328 at Ex.				
	2.				
Letter	Letter motion refers to	If relief is not granted,	A redacted, public ver-	No	No objection
dated May	(1) SaveOn's strategy for	SaveOn would be at a	sion of the letter is being		1.0 00,00000
21, 2024	communicating with	competitive disadvantage	filed. It is believed that		
[ECF No.	providers and patients,	should its proprietary	no less restrictive alter-		
301]	(2) internal emails	non-public business in-	native is available to pre-		
301	between SaveOn	formation and strategy	vent the disclosure of		
	employees discussing its	be disclosed to competi-	SaveOn's proprietary		
	communications with	tors and other market	business information.		
			ousmess imormation.		
	providers and patients,	participants.			

(3) the contents of		
internal drafts of		
communications to		
providers and patients,		
(4) communications		
between SaveOn and		
providers, and (5)		
communications between		
SaveOn and its clients,		
comprising proprietary		
business information.		
See ECF No. 301.		